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3 Including Professional Corporations
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16 Plaintiff

17
18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
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22 STEVEN DRANSFIELD,
23
24 Plaintiff,
25
26 v.
27 ROSS STORES, INC.,
28 Defendant.

Case No.: 3:16-cv-04681-EMC
Judge: Hon. Edward M Chen

**STIPULATION TO SUBMIT CASE
TO BINDING ARBITRATION AND
REQUEST FOR STAY PENDING
ARBITRATION; ~~[PROPOSED]~~
ORDER THEREON**

**COMPLAINT FILED: AUGUST 15, 2016
TRIAL DATE: TBD**

29 This Stipulation is made by and between Defendant Ross Stores, Inc.
30 (“Defendant” or “Ross”), by and through its attorneys of record, and Plaintiff Steven
31 Dransfield (“Plaintiff”) (collectively “the Parties”). This Stipulation is made with
32 reference to the following facts:

1 1. Plaintiff was formerly employed by Defendant. Plaintiff's employment
2 was governed by a Dispute Resolution Agreement ("Dispute Resolution
3 Agreement"), attached hereto as Exhibit A.

4 2. On or about August 15, 2016, Plaintiff filed a civil complaint with this
5 Court against Defendant entitled, Steven Dransfield v. Ross Stores, Inc., Case No.
6 3:16-cv-04681-EMC (the "Complaint"). The Complaint includes causes of action
7 under the Equal Pay Act of 1963, 29 U.S.C. § 206(d), *et seq.*, as amended; the
8 Americans with Disabilities Act, 42 U.S.C. § 12101, *et. seq.*, as amended; Title VII
9 of the Civil Rights Act of 1964, 42 U.S.C. § 2000(e)-2, *et seq.*, as amended; federal
10 common law; California Labor Code § 1197.5; common law of the State of
11 California and the California Constitution, including invasion of privacy, and
12 interference with the right to contract.

13 3. The Parties agree that the claims in Plaintiff's Complaint fall within the
14 scope of the Dispute Resolution Agreement; and

15 4. The Parties further agree to submit this matter to mediation and/or
16 arbitration pursuant to the terms set forth in Exhibit A.

17 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by
18 the Parties hereto as follows:

19 1. That Plaintiff will submit the claims set forth in this civil action to
20 mediation and/or arbitration, pursuant to the Dispute Resolution Agreement that
21 governed Plaintiff's employment and in accordance with the Parties' further
22 agreement as outlined above;

23 2. That the above-entitled action be stayed, pursuant to 9 U.S.C. § 3,
24 pending the final disposition of the arbitration;

25 3. That the Parties shall make a good faith effort to attend mediation
26 within three to four months, or as soon thereafter that a mutually agreed-upon
27 mediator is available; and

28 4. That the Parties request that the Court set status conferences to monitor

1 the progress of the mediation and/or arbitration.

2 **IT IS SO STIPULATED.**

3
4 Dated: September ~~12~~¹⁹, 2016

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6 SHEPPARD, MULLIN, RICHTER &
7 HAMPTON LLP

8 By


9 BABAK YOUSEFZADEH
10 ALEXIS N. GEVANTER

11 Attorneys for Defendant
12 ROSS STORES, INC.

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14
15 Dated: September 19, 2016

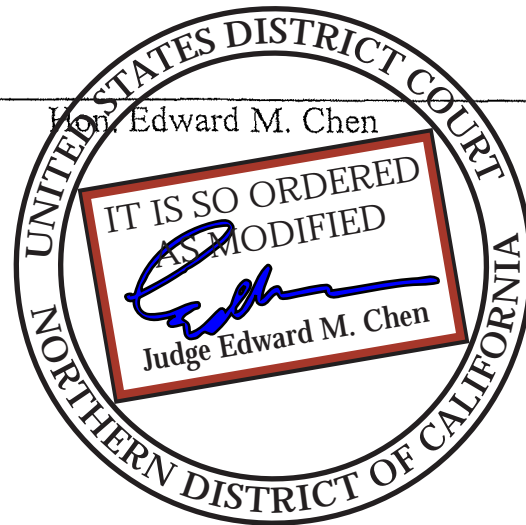
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17
18 By


19 STEVEN DRANSFIELD
20 Pro Se

1 [PROPOSED] ORDER

2 The Parties' joint Stipulation to Submit Case to Binding Arbitration and
3 Request for Stay Pending Arbitration is adopted by the Court, and this matter is
4 STAYED pending arbitration of Plaintiff's claims. ~~The Court will set status~~
5 ~~conferences to monitor the progress of case.~~

6 **IT IS SO ORDERED.** The Case Management Conference is set
7 for February 9, 2017 at 9:30 a.m. A joint
8 Dated: 9/21/16 CMC statement shall be filed by February 2,
9 2017.



PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of San Francisco, State of California. My business address is Four Embarcadero Center, 17th Floor, San Francisco, CA 94111.

On September 19, 2016, I served true copies of the following document(s) described as

**STIPULATION TO SUBMIT CASE TO BINDING ARBITRATION
AND REQUEST FOR STAY PENDING ARBITRATION; [PROPOSED]
ORDER THEREON**

on the interested parties in this action as follows:

STEVEN DRANSFIELD
309 4th St. #109
Oakland, California 94607
Telephone: 510-504-3982

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 19, 2016, at San Francisco, California.

